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9 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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11 FEDERAL TRADE COMMISSION,

12 Plaintiff,

13 v.

14 OMICS GROUP INC., et al.,

15 Defendants.

Case No. 2:16-cv-02022-GMN-VCF

STIPULATION AND ORDER TO  
EXTEND RESPONSE DEADLINE

(SECOND REQUEST)

16  
17 Defendants, OMICS GROUP INC., IMEDPUB LLC, CONFERENCE SERIES LLC,  
18 and SRINUBABU GEDELA, by and through counsel of record, D. Neal Tomlinson and  
19 Kristina R. Kleist, and Plaintiff, FEDERAL TRADE COMMISSION, by and through counsel of  
20 record, Gregory A. Ashe and Michael E. Tankersley, hereby agree and stipulate as follows:

- 21 1. On March 23, 2018, Plaintiff filed its Motion to for Sanctions Regarding Solicitation  
22 Evidence (Dkt. No. 72).  
23 2. On April 2, 2018, a hearing took place on Plaintiff's Motion to Compel (Dkt. No. 63)  
24 and Motion to Compel to Determine the Sufficiency of Answers to Requests for  
25 Admissions (Dkt. No. 66).  
26 3. On April 4, 2018, a Minute Order was issued granting Plaintiff's Motions and  
27 requiring Defendants to provide complete responses.  
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4. Additionally, pursuant to the Minute Order, the parties are required to file a joint status report concerning any outstanding discovery by April 23, 2018 and thereafter a hearing will be set on Plaintiff's Motion for Sanctions.
5. Following the hearing, a conference was held between Plaintiff's counsel, Defendants' counsel, and Mr. Kishore Vattikoti, Defendants' Indian counsel, to identify and discuss all discovery issues.
6. While Mr. Vattikoti was in the United States, Defendants and counsel reviewed and provided revised responses to Plaintiff's discovery requests as required by the Order and as discussed in the conference which took place thereafter.
7. As a professional courtesy and in accommodation of Defendants' and their counsel addressing the Order on Plaintiff's Motions, and other discovery issues identified by Plaintiff, Plaintiff's counsel agreed to an extension of the April 6, 2018 response deadline for the Motion to for Sanctions Regarding Solicitation Evidence (Dkt. No. 72) which was granted by this Court (Dkt. No. 75).
8. Plaintiff provided Defendants with a letter on April 10, 2018 regarding Defendants' revised responses.
9. As a professional courtesy, Plaintiff's counsel will accommodate an additional extension request due to Defendants' continued efforts to address all of Plaintiff's concerns regarding discovery.
10. The parties have agreed that Defendants will file their response no later than April 20, 2018.

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1 11. This Stipulation is being made in good faith between and at the request of both  
2 Parties, and not for purposes of delay.

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4 HYPERION ADVISORS

FEDERAL TRADE COMMISSION

5 Dated this 16<sup>th</sup> day of April, 2017.

Dated this 16<sup>th</sup> day of April, 2017.

6 /s/ D. Neal Tomlinson

/s/ Michael E. Tankersley

7 D. NEAL TOMLINSON

DAVID C. SHONKA

8 Nevada Bar No. 06851

Acting General Counsel

9 KRISTINA R. KLEIST

GREGORY A. ASHE

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MICHAEL E. TANKERSLEY

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Federal Trade Commission

Las Vegas, Nevada 89169

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Washington, DC 20850

11 *Attorneys for Defendants*

*Attorneys for Plaintiff*

12 **ORDER**

13 **IT IS SO ORDERED.**

14 Dated this 16<sup>th</sup> day of April, 2018.

15 

16 UNITED STATES MAGISTRATE JUDGE

17 Respectfully submitted by:

18 HYPERION ADVISORS

19 /s/ D. Neal Tomlinson

20 D. NEAL TOMLINSON

21 Nevada Bar No. 06851

KRISTINA KLEIST

22 Nevada Bar No. 13520

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on April 16, 2018, a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND RESPONSE DEADLINE (SECOND REQUEST)** was filed electronically with the United States District Court for the District of Nevada using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/ D. Neal Tomlinson  
Attorney for Defendants